

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:	)	
	)	
BEACH HOUSE, LLC	)	
	)	Chapter 11
	)	Case No. 24-20211
Debtor.	)	

**SECOND SUPPLEMENTAL VERIFIED STATEMENT OF DAVID C. JOHNSON PURSUANT TO FED. R. BANKR. P. 2014(a) AND D.ME. LBR 2014-1**

1. I am a partner and shareholder in the law firm of Marcus, Clegg, Bals & Rosenthal, P.A., also known as Marcus | Clegg (“MC”), a law office with its principal place of business at 16 Middle Street, Suite 501, Portland, Maine 04101.

2. I make this Second Supplemental Verified Statement in support of the *Debtor’s Application for Authority to Employ Marcus Clegg as Counsel for the Debtor Effective as of October 17, 2024, the Petition Date* (the “Application”) [D.E. # 23] and pursuant to the Court’s *Order Granting in Part, Marcus/Clegg’s First Application for Interim Award of Professional Fees and Reimbursement of Expenses* [D.E. # 196]. I have personal knowledge of the facts contained in this Second Supplemental Verified Statement.

3. On March 31, 2024, and in response to new information provided by the Debtor’s principal, the Debtor filed a *List of Equity Security Holders – Amended* [D.E. # 130] which indicated that the L.F. Perkins Family Tennessee Investment Services Trust (the “Trust”) owned 90% of the Debtor and other 10% was owned by Jack H. Lieberman. The original *List of Equity Security Holders* [D.E. # 1, p. 9 of 11] had indicated that that Trust was the 100% owner of the Debtor.

4. In addition, and as the Court is aware, an entity wholly owned by Taylor Perkins, SL Holdings, LLC (“SL Holdings”), made a post-petition payment to MC in the

amount of \$ 4,749.50 for payment of prepetition services (to replace a pre-petition check that was returned for insufficient funds). *See* D.E. ## 146, 196.

5. MC has performed a conflict check with respect to both Mr. Lieberman and SL Holdings. MC has no connection of any sort to either, other than the fact that Taylor Perkins is the principal of both SL Holdings and the Debtor<sup>1</sup> and Lieberman is a direct owner of 10% of the Debtor.

6. I certify under penalty of perjury that the foregoing is true and correct.

DATED: July 1, 2025

/s/ David C. Johnson  
David C. Johnson, Esq.

### **CERTIFICATE OF SERVICE**

I, David C. Johnson, hereby certify that I am over eighteen years old and that on July 1, 2025, I caused a true and correct copy of the foregoing document to be served upon all parties receiving notice in this case through the Court's CM/ECF facility.

/s/ David C. Johnson  
David C. Johnson

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<sup>1</sup> As well as York Beach Surf Club and 11 Webber Holdings, LLC. *See* case no. 25-20021, D.E. # 42-4, ¶ 3(a).